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March 31, 2010

MEMORANDUM

FROM: Jacqueline Harvey, Environmental Protection Specialist
Superfund Remedial Enforcement & Collections Section 

TO: File

SUBJECT: Florida Phosphate Mines Initiative PRP Search Status and Strategy

BACKGROUND

A review of the phosphate mining sites in the south-central Florida area indicates that they can be place in two broad categories with many similar but unique characteristics: 1) undeveloped current and former phosphate mining sites; and 2) developed former mining sites. Most of the phosphate mining sites currently in CERCLIS fit into the first category and are primarily sites in various stages of operation and closures. These sites typically encompass thousands of acres and may included mined areas, waste disposal areas, plant processing areas, or any combination thereof.

The second category of phosphate mining sites includes former mining areas that have since been closed and are now developed. These are generally older mines that were operated in the late 1800s and early to mid 1900s. Mining operations that occurred at these sites were similar to current mining operations, but were generally less sophisticated and less efficient. As a result of being less efficient, these sites have the potential for exposing and leaving greater quantities of radium laden phosphate ore near the surface. Therefore, elevated radium levels and associated radon may occur, not only in the former processing areas, but in some of the former mining areas as well.

FLORIDA PHOSPHATE SITES CURRENTLY LISTED IN CERCLIS

The following list represents Florida Phosphate Initiative sites currently listed in CERCLIS.



Haynesworth Mine Brewster Plant
Bradley Junction, Polk County
CERCLA ID #: FLD000826842
Site/Spill ID #: B480

IMC Clear Springs Mine
Bartow, Polk County
CERCLA ID #: FLD0000770420
Site/Spill ID #: B481

Intl Mineral & Chem Kingsford Mine
Bradley, Hillsborough & Polk Counties
CERCLA ID #: FLD0000770453
Site/Spill ID #: B482

Mobil Mining & Minerals Co. Electro-
Phosphate Plant
Mulberry, Polk County
CERCLA ID #: FLD070864285
Site/Spill ID #: B424

Mobil Oil Nichols Prep Plant
Nichols, Polk County
CERCLA ID #: FLD004106407
Site/Spill ID #: B483

Mobil Ft. Meade Mine
Fort Meade, Polk County
CERCLA ID #: FLD021714639
Site/Spill ID #: B484

Mulberry Phosphates, Inc.
Mulberry, Polk County
CERCLA ID #: FLD004106415
Site/Spill ID #: A43X

New Wales Chemical, Inc.
Mulberry, Polk County
CERCLA ID #: FLD084717545
Site/Spill ID #: A4HC

Occidental Chemical Co.
White Springs, Hamilton County
CERCLA ID #: FLD038491445
Site/Spill ID #: A4HF

Sydney Mine Sludge Ponds
Brandon, Hillsborough County
CERCLA ID #: FLD000648055
Site/Spill ID #: 041R

T/A Mineral Corp. Mulberry Plant
Mulberry, Polk County
CERCLA ID #: FLD077586634
Site/Spill ID #: B485

U.S. Agri-Chemicals Corporation
Fort Meade, Polk County
CERCLA ID #: FLD045003316
Site/Spill ID #: B486

PRP Search activities have been ongoing for various sites identified as Florida Phosphate Initiative sites since approximately 1987. An undated Florida Phosphate Initiative CERCLIS Site List includes current and former owner/operators and successor corporations for 21 of the 28 sites (Attachment 1).

PRP and Title Search activities were conducted in 1987 for the Sydney Mine site and updated in 1998; in 2005 for the W.R. Grace & Company, International Minerals & Chemical, Mobil Oil Corporation, and U.S. Agri-Chemicals Corporation properties; in 2007 for Agrico Chemical Co. S. Pierce Works; and in 2009 for Coronet Industries.

Agrico Chemical Co. S. Pierce Works

Former owners of this property have been identified as American Agricultural Chemical Company, Continental Oil, Texas Gulf Sulphur Company, and Freeport-McMoran Resource Partners Acquisition. Additional research is required to determine if these parties are liable.

Coronet Industries

Among the parties with potential owner/operator liability are Warren Land, LLC, Hardee Manufacturing Company, Consolidated Minerals Inc. & Florida Crushed Stone, The Borden Company, Smith-Douglas Company, and Coronet Phosphate Company.

Associated Companies

The December 2005 memorandum to the file identified the following as active/viable:

- 1) Borden Chemical Company associated with Tenoroc Mine;
- 2) Cargill, Inc. associated with Gardinier, Inc.;
- 3) CF Industries associated with Central Phosphate;
- 4) Cytec Industries associated with Brewster Lonesome;
- 5) Estech, Inc. associated with both Estech Watson and Silver City Mines;
- 6) Exxon Mobile Corporation associated with Mobil Mining & Minerals Co. Electro-Phosphate Plant, Mobil Ft. Meade Mine and T/A Mineral Corp.;
- 7) Farmland Industries associated with Farmland Industries Mine;
- 8) Freeport-McMoran Copper & Gold, Inc. associated with Agrico-Chem Co. Payne Creek Mine;
- 9) IMC Global, Inc. associated with Haynesworth Mine;
- 10) Mosaic Phosphates Company associated with Agrico-Chem Co. Palmetto, Agrico-Chem Co. Payne Creek, Agrico-Chem Co. Saddle Creek, W.R. Grace Four Corners, Mobil Mining & Minerals Co. Electro-Phosphate Plant, Agrico Chemical Co. S. Pierce Works, IMC/Clear Springs and International Mineral & Chemical Kingsford;
- 11) U.S. Agri-Chemicals Corporation, a subsidiary of USAC Holdings, Inc. associated with U.S. Agri-Chemicals Corporation;
- 12) U.S. Steel Corporation associated with U.S. Agri-Chemicals Corporation;
- 13) W.R. Grace & Co. associated with Agrico-Chem Co. Palmetto, W.R. Grace Four Corners and W.R. Grace Bonny Lake; and
- 14) The Williams Companies, Inc. associated with Agrico-Chem. Co. Saddle Creek.

The memorandum associated the following companies with mines in the south-central Florida area; however the viability of these companies is not known:

A Performance Work Statement (PWS) and Independent Government Cost Estimate (IGCE) has been prepared to solicit ESS contractor support for baseline PRP Search activities which will include but is not limited to title search, review of the state's files and corporate successor information for each facility. The PWS outlines these activities for each of the 28 CERCLIS sites identified to date; however, sites identified as priority and requiring a baseline PRP Search in FY 2010 are Borden Chemical/Tenoroc Mine, W.R. Grace & Bonny Lake Mine, and Sydney Mine.

Mobil Fort Meade Mine, Estech, Inc. Watson Mine, IMC Kingsford Mine, and W.R. Grace Four Corners Mines have been identified as those sites targeted for PRP Search activities in FY 2011. Priorities beyond FY 2011 have not yet been identified. The Task Order Manager will direct the ESS contractor to conduct baseline PRP Search activities for the remaining sites in order of priority as determined by the enforcement team.